EPA Comments on the Programmatic HAZWOPER Health and Safety Plan Portland Harbor Pre-Remedial Design Investigation and Baseline Sampling Dated January 12, 2018

Submitted January 22, 2018

Following are United States Environmental Protection Agency's (EPA's) comments on the Programmatic HAZWOPER Health and Safety Plan Portland Harbor Pre-Remedial Design Investigation and Baseline Sampling, Portland Harbor Superfund Site (HASP), dated January 12, 2018. The HASP was prepared by AECOM on behalf of the Pre-RD AOC Group.

Overall HASP Comment

The HASP covers health and safety hazard identification, evaluation, control, and emergency response actions for the pre-remedial design investigation (PDI) study area and activities; however, the HASP relies on forthcoming HASP addendums for PDI-specific investigations. For example, no details are provided on the methodology, equipment, crew members and training, hazard assessment, or emergency response actions for the bathymetric survey. The HASP does meet many of the Occupational Safety Health Administration's (OSHA's) requirements and the requirements established in the Administrative Settlement Agreement and Order on Consent for Pre-Remedial Design Investigation and Baseline Sampling (CERCLA Docket No. 10-2018-0236); however, the following comments require attention. The HASP will not be complete until all of the noted issues have been addressed and a revised document issued, and the forthcoming HASP addendums that are referenced in the HASP are incorporated.

Comments are separated as "Primary," which identify concerns that must be resolved to achieve the assessment's objective; "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the assessment's objectives; and "Matters of Style," which substantially or adversely affect the presentation or understanding of the technical information provided in the report.

Primary Comments

1. The "Maximum Concentration Found On-site" columns in the tables in Section 8.1 need to be populated based on data collected during the Portland Harbor remedial investigation/feasibility study (RI/FS) in the PDI study area. Because the HASP presents no data on the concentrations of the contaminants in the sediment or water, it is not possible to assess the degree of exposure. It is normal to provide source concentration information as a surrogate for exposure. This information is needed to determine whether or not the level of personal protective equipment (PPE) and air monitoring specified in the HASP is sufficient.

2. Appropriate air monitoring equipment, procedures, action levels, and contingency measures should be provided in this plan. Benzene is identified as a common

contaminant of concern in groundwater and vapor and other volatile organic compounds (VOCs) are expected to be present in sediment and porewater at the PDI that could result in exposure to sampling crews.

3. All personnel aboard watercraft, collecting and processing samples or data on the boat, in the water, and on the shore, should have 40-hour HAZWOPER training, current 8-hour refresher training, and clearance under a medical surveillance program in accordance with OSHA. Portland Harbor is a Superfund Site and any personnel involved with sampling or instrument deployment or entering an exclusion zone or contamination reduction zone has the potential for exposure to hazardous materials.

4. Rehearsal of the emergency response plan should be discussed in the HASP. Regular rehearsal of the emergency response plan is called for under 1910.120(l)(3)(iv) of the HAZWOPER standard.

5. The exclusion zone, contamination reduction zone, and support zone should be specifically defined or illustrated in Section 11.1, Study Area Work Zones. The references to these zones in the HASP are meaningless without definition of these zones for each of the planned investigations.

6. Additional information on the automated external defibrillator (AED) should be included in the HASP. This should include a statement that the AED will be at an accessible location at each work site, confirmation it will be in an unlocked location, and procedures on use. A description on how the AED will be checked for the absence of the low battery indicator on a daily basis should be added.

7. Section 12.8, Spill or Release, should be updated to address all spill or release response and reporting requirements presented in Section 3.5 of the Pre-Remedial Design Investigation and Baseline Sampling Statement of Work (attachment of the Administrative Settlement Agreement and Order on Consent for Pre-Remedial Design Investigation and Baseline Sampling). Included under these requirements are the need for immediate spill response and notification of EPA and other agencies. The spill or release procedures should also address fuel or hydraulic oil spills related to the overwater equipment and any requirements to notify the Oregon Emergency Response System (OERS), National Response Center (NRC), and U.S. Coast Guard. Phone numbers for these agencies should be included in the HASP.

To Be Considered Comments

1. A site map showing the study area and sampling area for each investigation task covered under the HASP should be provided in Section 2.1, Study Area Description, to clarify work areas and access.

2. Section 11.2, Simultaneous and Neighboring Operations, does not contain sufficient detail to be useful in controlling hazards related to other ongoing operations in the study area. This is of considerable concern give that Portland Harbor is an active port with ship traffic, dock work, and multiple activities occurring in the study area. The

expected simultaneous and neighboring operations and communication protocol should be provided in the HASP.

3. The OERS phone number should be listed in Section 12.1, Incident/Emergency Contact Information. Text should also be added to underscore the need to report spills to both OERS and the NRC (this includes oil/diesel/gas from sampling equipment and vessels), immediately after safety of onsite personnel has been dealt with (as applicable – the spill in question may or may not injure personnel during the release).

4. The use of safety-toe work boots only when crew is lifting items heavier than 25 pounds would not be protective in the event of falling overhead objects (e.g., hoisted drill pipe or samplers) or rolling heavy objects such as drums. EPA recommends modifying the use of safety-toe boots for all activities.

5. The HASP provides only general information on how field survey/sampling equipment will be decontaminated. A statement should be added that each task-specific HASP addendum will specific what equipment will be decontaminated, how it will be decontaminated, and specific direction on the disposal of decontamination fluids.

6. Man-overboard training should be listed in the site-specific training table in Section 5.3, Worker Training and Qualifications. The job safety analysis documentation in Appendix D describes this training as a requirement for all staff aboard the vessel for each overwater task.

7. Cold weather training should be listed in the site-specific training table in Section 5.3, Worker Training and Qualifications.

8. Appendix B, AECOM SH&E Field Applicable Procedures, does not provide adequate procedures to cover the activities that are described to occur during the PDI. Detailed description of some activities are provided; however, no procedures are provided for the main PDI activities of bathymetric instrumentation deployment, hook and angling of fish, electroshocking of fish, cleaning of fish, packaging and shipping of samples, high volume water sampling, Vibracore sampling, fish tagging, sediment trap deployment and recovery, and porewater sampling using peeper samplers. The procedures or guidelines for these activities should be added to the HASP.

9. The lone worker protocol needs to be clarified in the HASP. Under Attachment 3, Study Area Orientation, the lone worker check-in procedures are listed as a discussion topic for the safety briefing; however, under Section 3.10 it is stated that there will be no lone workers on the project.